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March 18, 1983

Mr. Gerard Sotolongo
USEPA
Waste Management Division
John F. Kennedy Federal Building
Boston, MA 02203

Dear Mr. Sotolongo:

The following are my comments on the January 1983 Draft New Bedford Remedial Action Master Plan (RAMP).

General comments:

Although in general the RAMP is a good document, I think there are several areas which could be improved. The chief problem is lack of emphasis on disposal methods/ options. Perhaps naively I believe this to be the crux of the matter, and suggest that a cost analysis of various disposal methods is essential to any clean-up plans. This study can be in concert with a determination of a minimum acceptable level of remedial action since any cost analysis must take both factors into consideration. Hence, project 010 should have highest priority, followed by projects 004 and 008, then 009.

Further, I suspect much of the data called for in the RAMP already exists and that therefore projects 004 and 008 ought to be brief in duration. The two years suggested for 008 sounds excessive. Project 009 also ought to be shorter than two years.

Finally, hot spot action – dredging or temporary impoundment – ought to commence as soon as possible.
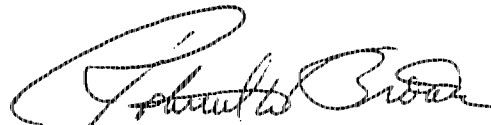
Specific comments

1. Page 12 – 2.1 —— "Undisclosed sources and sites" is meaningless. We can correct what we know about and incorporate new sites and sources while in progress. The RAMP is, after all, dynamic.

2. Page 14 – 2.3.1 —— Several references to I-95 should be I-195.

3. Page 17 – 2.3.1 —— Why question the validity of the metals data? If metals do behave similarly to PCB's (i.e. correlate well to fine grained sediments) and if the problem is assumed to be the result of ca. 40 years of manufacturing, then we might assume that measurements are not transient.

4.   Page 18 – 2.3.1 – Top of the page —— What data suggests depuration of PCB's? The idea is at odds with what is known about PCB metabolism. In fact, how can one distinguish between all the other factors —— age and migration particularly —— and this so-called depuration. The notion of depuration is unsupported by ANY data on lobsters in the harbor collected to date.

5.   Page 18 – 2.3.1 – Second paragraph —— Correct from I-95 to I-195.

6.   Page 20– 2.3.2 – 2nd paragraph —— A continuing theme in the RAMP is a tendency to dismiss existing data as "old" and call for new studies. The New Bedford problem was decades in the making, no action has occurred since the data were taken, so what new information can we obtain here? Even if new data are obtained on the landfill, will it alter our definition of the scope of the problem or the directions we should take in solving it?

7.   Page 24 – 2.3.5 —— Even where the air monitoring disclosed detectable amounts of PCB's are they significant from a health standpoint? Wouldn't the corrective actions proposed vis-a-vis the sewage system eliminate the problem for the most part? The existing data seems to confirm that PCB's are not very volatile. Air monitoring might be better geared to reconfirm existing data and check on progress in eliminating PCB's from leaving the incinerator (by removing them from the sewage).

8.   Page 24 – 2.3.6 —— How much do we need to do here? Has anyone assessed the likely significance of these undisclosed sites?

9.   Page 38 – 4.3 —— Where is the rest of the paragraph?

10.   Pages A18–A19 – Project 007 —— Haven't some of these sites (e.g. Cushman Park) been investigated already?

11.   Page A22–A25 – Project 008 —— This project is important but isn't this overkill? Some of the data may exist (food chain).

12.   Pages A26–A39 – Projects 009 and 010 —— The time alloted for project 010 seems rather long, especially since the information is essential to project 009. Is the "fast-track" budget part of the total budget or separate.

I hope these comments are helpful. If I can be of further assistance, do not hesitate to call.

Sincerely,

Robert H. Brown, Ph.D.

RHB:M

cc.   Thomas McMahon
      Ralph Timperi